

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Kalejandra Maria Olga Saldivar

YOB: 1996

Principal

United States

Case Number:

M-20-0366 -M

Juan Angel Garcia

YOB: 1977

Co-Principal

Mexico

United States

(Name and Address of Defendant)

Amal - 2/10/20.

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 6, 2020 in Starr County, in the Southern District of Texas defendants(s) did, (Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Yuri Melissa Suchite-Garcia, citizen of Honduras, along with one (1) other undocumented alien, for a total of two (2), who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from a location in Roma, Texas to the point of arrest Roma, Texas, by means of a motor vehicle,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:

On February 6, 2020, Roma Police Department received a concerned citizen call reporting a suspicious black in color vehicle outside his house. Roma Police Officers responded and made contact with the occupants of the black vehicle.

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on February 8, 2020.

## SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

/s/ Julio C. Peña

Signature of Complainant

Julio C. Peña

Border Patrol Agent

Printed Name of Complainant

February 8, 2020 @ 11:16 a.m.  
Date

at McAllen, Texas  
City and State

Juan F. Alanis, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-20- 0366 -M**

**RE: Kalejandra Maria Olga Saldivar  
Juan Angel Garcia**

During this time, across the street a white in color vehicle was observed leaving a residence when an officer observed it had two subjects laying flat in the rear passenger seat. The white vehicle proceeded to leave the area but a Roma Policer Officer immediately followed the vehicle and discovered it had expired registration. The Officer conducted a traffic stop and determined the driver, later identified as Karlejandra Maria Olga Saldivar, had two suspected undocumented aliens in the rear seat of the vehicle. At this time, the officer requested assistance from Border Patrol.

Border Patrol Agents arrived and determined the two rear passengers were undocumented aliens. Agents proceeded to read Saldivar her Miranda Rights. Saldivar agreed to answer questions and admitted to agents that she picked up the illegal aliens from the house she had just left. Saldivar and the undocumented aliens were transported to the Rio Grande City Border Patrol Station.

Agents then approached officers still investigating the suspicious black vehicle callout. Agents approached the front passenger, identified as Juan Angel Garcia, and identified themselves. Garcia told agents that he would cooperate but his wife, the driver, and son did not have anything to do with it. Agents explained they did not know what he was talking about. Garcia explained that he told the girl (Saldivar) to pick up the undocumented aliens from the house. Garcia pointed to the residence that Saldivar was seen leaving. Garcia was read his Miranda Rights and transported to the Rio Grande City Border Patrol Station for processing.

**PRINCIPAL STATEMENT:**

Kalejandra Maria Olga Saldivar and Juan Angel Garcia were read their Miranda Rights. They understood and each provided a sworn statement.

Saldivar, a United States Citizen, stated she picked up two illegal aliens for a friend. Saldivar stated that she did not pick up the illegal aliens at the house. Saldivar now claimed she picked them up at a convenience store from a person driving a gold sedan. Saldivar claimed she was getting instructions over the phone. Saldivar did not know the name of the person that was giving her instructions however, Saldivar was able to identify him as Juan Angel Garcia, through a photo lineup. After picking up the aliens, she was instructed to wait at a Whataburger and needed to pickup one more from a house. Garcia met with Saldivar and told her to follow. Saldivar followed Garcia until he pointed to a house where she parked in the driveway. At the house, a man came out and told her she needed to go. Saldivar noticed the police and she left. Saldivar stated she was supposed to receive a total of \$750 for the three aliens.

**CO-PRINCIPAL STATEMENT:**

Garcia, a United States Citizen, stated he received a call to show a women where to pick up undocumented aliens and would get paid \$100. Garcia waited for the woman at a Whataburger and then took her to where she needed to pick up two undocumented aliens. Garcia then took her to the second house where she was supposed to pick one up.

Garcia identified Kalejandra Maria Olga Saldivar, through a photo lineup, as the woman that picked up the undocumented aliens.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-20- 0360 -M**

**RE: Kalejandra Maria Olga Saldivar  
Juan Angel Garcia**

**MATERIAL WITNESS STATEMENT**

Yuri Melissa Suchite-Garcia was read her Miranda Rights. She understood her rights and provided a sworn statement.

Suchite, a citizen of Honduras, stated the smuggling arrangements cost about \$10,000. Suchite arrived to Miguel Aleman with her nephew. They were crossed into the United States on a raft then picked up by a female in a truck and taken to a house. At the house, the female told them there was food and drinks. Suchite claimed they were being transported by the same female when they were stopped by the police.

Suchite identified Saldivar, through a photo lineup, as the female who picked her up.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS